



The Dow Chemical Company
Midland, MI 48674
U.S.A.

December 15, 2015

Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

25% Glutaraldehyde Concentration

EPA Reg. No. 464-690 – MUP

EPA Reg. No. 464-688 – EUP

EPA Reg. No. 464-706 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for each of the above three 25% glutaraldehyde products, none of the products would be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above three registration numbers.

2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following two registration numbers are end use products that are formulated. They are not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on these formulated products:
EPA Reg. No. 464-688 and EPA Reg. No. 464-706

Submitted by:

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Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

50% Glutaraldehyde Concentration

EPA Reg. No. 464-691 – MUP

EPA Reg. No. 464-704 – EUP

EPA Reg. No. 464-705 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for each of the above three 50% glutaraldehyde products, none of the products would be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above three registration numbers.

2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following two registration numbers are end use products that are formulated. They are not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on these formulated products:
EPA Reg. No. 464-704 and EPA Reg. No. 464-705

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Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

30% Glutaraldehyde Concentration

EPA Reg. No. 464-714 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

- 1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 30% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.
- 2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product:
EPA Reg. No. 464-714

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December 15, 2015

Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

20% Glutaraldehyde Concentration

EPA Reg. No. 464-689 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

- 1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 20% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.
- 2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product:
EPA Reg. No. 464-689

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December 15, 2015

Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

4% Glutaraldehyde Concentration

EPA Reg. No. 464-707 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 4% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.

2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product:
EPA Reg. No. 464-707

3) Guideline Requirement Numbers:

Guideline / Study Title	Status / Waiver
830.6314 – Oxidizing or reducing action	Dow will be submitting data on the 25% concentration. While this product is a 21% change in concentration, we would not expect any significant change to the Oxidizing or reducing action due to the change in concentration. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6315 - Flammability	Dow will be submitting data on the 25% concentration. While this product is a 21% change in concentration, we would not expect a significant change to the flammability result due to the change in concentration. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6316 – Explodability	Dow will be submitting data on the 25% concentration. While this product is a 21% change in concentration, we would not expect a significant change to the explodability result due to the change in concentration. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6319 – Miscibility	Dow will be submitting data on the 25% concentration. While this product is a 21% change in concentration, we would not expect a significant change to the miscibility result due to the change in concentration. As a result, we would request the Agency to accept the read across to the 25% for this requirement.

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Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

20% Glutaraldehyde Concentration

EPA Reg. No. 464-8133 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

- 1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 20% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.
- 2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product:
EPA Reg. No. 464-8133

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December 15, 2015

Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

15% Glutaraldehyde Concentration

EPA Reg. No. 464-693 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 15% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.

2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product:
EPA Reg. No. 464-693

3) Guideline Requirement Numbers:

Guideline / Study Title	Status / Waiver
830.6302 – Color	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration (less concentrated) and we would not expect any significant change to the color. As a result, we would request the Agency to accept the read across to the 25% value for this requirement.
830.6303 – Physical State	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the physical state. Both products are liquids. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6304 – Odor	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the odor. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6314 – Oxidizing or reducing action	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any measureable change to the Oxidizing or reducing action due to the 1% change in concentration. As a result, we would request the Agency to accept the read across to the 25% for



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	this requirement.
830.6315 - Flammability	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the flammability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6316 - Explodability	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the explodability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6317 - Storage Stability	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the storage stability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6319 - Miscibility	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the miscibility result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6320 - Corrosion Characteristics	Dow will be submitting data on the 25% concentration. This product is a 10% change in concentration and we would not expect any significant change to the corrosion characteristic result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.

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Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

24% Glutaraldehyde Concentration

EPA Reg. No. 464-8130 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 24% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.

2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product:
EPA Reg. No. 464-8130

3) Guideline Requirement Numbers:

Guideline / Study Title	Status / Waiver
830.6302 – Color	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration (less concentrated) and we would not expect any significant change to the color. As a result, we would request the Agency to accept the read across to the 25% value for this requirement.
830.6303 – Physical State	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the physical state. Both products are liquids. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6304 – Odor	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the odor. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6314 – Oxidizing or reducing action	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any measureable change to the Oxidizing or reducing action due to the 1% change in concentration. As a result, we would request the Agency to accept the read across to the 25% for



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	this requirement.
830.6315 - Flammability	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the flammability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6316 - Explodability	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the explodability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6317 - Storage Stability	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the storage stability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6319 - Miscibility	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the miscibility result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.6320 - Corrosion Characteristics	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the corrosion characteristic result due to addition of more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.7000 - pH	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to the pH due to addition of 1% more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.
830.7300 - Density And 830.7100 - Viscosity	Dow will be submitting data on the 25% concentration. This product is only a 1% change in concentration and we would not expect any significant change to density due to addition of 1% more water. As a result, we would request the Agency to accept the read across to the 25% for this requirement.

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Waiver Request

Case # and Name: 2315 Glutaraldehyde

Product Specific ID# PDCI-043901-30503

45% Glutaraldehyde Concentration

EPA Reg. No. 464-692 – EUP

This waiver request is to address the EPA Data Call In Notice (DCI) for product chemistry testing. Specifically:

- 1) Guideline Requirement Number: 830.6321, Dielectric breakdown voltage – based on the label Directions for Use for the above 45% glutaraldehyde product, the product would not be expected to be used or be in the vicinity of electrical equipment and or electrical conduits. As a result, Dow is requesting a waiver from having to conduct this study requirement for the above registration number.
- 2) Guideline Requirement Number: 830.1700, Preliminary analysis – the following registration number is an end use product that is formulated. It is not made by an integrated process. As a result, Dow requests a waiver from performing an analysis on this formulated product.
- EPA Reg. No. 464-692

3) Guideline Requirement Numbers:

Guideline / Study Title	Status / Waiver
830.6302 – Color	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration (less concentrated) and we would not expect any significant change to the color. As a result, we would request the Agency to accept the read across to the 50% value for this requirement.
830.6303 – Physical State	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the physical state. Both products are liquids. As a result, we would request the Agency to accept the read across to the 50% for this requirement.
830.6304 – Odor	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the odor. As a result, we would request the Agency to accept the read across to the 50% for this requirement.
830.6314 – Oxidizing or reducing action	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any measureable change to the Oxidizing or reducing action due to the 5% change in concentration. As a result, we would request the Agency to accept the read across to the 50% for



	this requirement.
830.6315 - Flammability	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the flammability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 50% for this requirement.
830.6316 - Explodability	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the explodability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 50% for this requirement.
830.6317 - Storage Stability	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the storage stability result due to addition of more water. As a result, we would request the Agency to accept the read across to the 50% for this requirement.
830.6319 - Miscibility	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the miscibility result due to addition of more water. As a result, we would request the Agency to accept the read across to the 50% for this requirement.
830.6320 - Corrosion Characteristics	Dow will be submitting data on the 50% concentration. This product is only a 5% change in concentration and we would not expect any significant change to the corrosion characteristic result due to addition of more water. As a result, we would request the Agency to accept the read across to the 50% for this requirement.

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